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Of Attorneys for Creditor We Collect, Inc. dba Atlas Financial Services  
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6 IN THE UNITED STATES BANKRUPTCY COURT  
7 FOR THE DISTRICT OF OREGON

8 In Re:	)	
	)	Case No. 21-31455-thp13
9 BRIDGET L. TOWLES,	)	
	)	
10 Debtor	)	
	)	
11 BRIDGET L. TOWLES,	)	
	)	Adversary No. 21-03046-thp
12 Plaintiff,	)	
	)	
13 v.	)	CREDITOR'S ANSWER TO
	)	AMENDED COMPLAINT
14 WE COLLECT, INC., dba ATLAS	)	
FINANCIAL SERVICES,	)	
	)	
15 Defendant	)	
	)	
16	)	
	)	
17	)	

18 Comes Now the creditor, by and through, its Attorney Mark G. Passannante and Broer &  
19 Passannante, P.S. and answers plaintiff's amended complaint as follows:

20 1.

21 Admit the allegations of paragraph 1 to the extent that it alleges this Court has  
22 jurisdiction over the matter.

23 2.

24 Admit the allegations of paragraph 2.

25 3.

26 Creditor is without sufficient knowledge to admit or deny the allegations of paragraph 3  
27 and therefore denies the same.

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Admit the allegations of paragraph 4.

Deny the allegations of paragraph 5, plaintiff’s judgment lien was created on April 21, 2021 as provided by ORS 46.488(2).

Defendant is without sufficient information or knowledge to know what plaintiff is referring to in relation to a potential secured claim and therefore denies that allegation.

Defendant restates its responses to paragraphs 1 through 6 in response to paragraph 7.

Admit the allegations of paragraph 8 to the extent that it alleges defendant’s Judgment Lien attached within 90 days of the bankruptcy filing.

Admit the allegations of paragraphs 9(a) and (b), defendant is without sufficient information or knowledge to admit or deny the allegations of paragraph 9(c) and (d) and therefore denies the same.

Deny the allegations of paragraph 10.

Defendant restates its responses to paragraphs 1 through 10 in response to paragraph 11.

Deny the allegations of paragraph 12.

Deny the allegations of paragraph 13 and 14.

Except as specifically admitted herein, defendant denies each and every allegation of plaintiff’s amended complaint.

AFFIRMATIVE DEFENSE

15.

Defendant restates its responses to plaintiffs allegations in the amended complaint herein.

16.

Debtors do not have an unrestricted right to avoid preferences that have not been avoided by the trustee.

17.

Defendant's lien does not impair Debtors exemption in the property identified in her amended complaint and thus, plaintiff is not entitled to avoid defendant's lien.

Wherefore having fully answered the amended complaint, defendant requests that the adversary proceeding against it be dismissed and it be awarded its costs incurred defending the same.

November 5, 2021

/s/Mark G. Passannante  
Mark G. Passannante, OSB#944035  
Of Attorneys for Creditor We Collect, Inc.

Service by:

e-service on November 5, 2021 to: Richard Parker, attorney for plaintiff